

PLAINTIFF'S
EXHIBIT

27

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DECLARATION OF JOSHUA MUHAMMAD

My name is Joshua Muhammad and I am over the age of 18 and fully competent to make this declaration. Under penalty of perjury, I declare the following:

1. I am 28 years old and a senior majoring in engineering at Prairie View A&M University (“PVAMU”).
2. I am a Black registered voter in the State of Texas and have voted in Prairie View during my time as a PVAMU student.
3. I use early voting because I have a busy student schedule and there are less lines and wait times to vote when I have used early voting in the past as compared to when I have voted on an Election Day.
4. I serve on the executive board of PVAMU’s Student Government Association as the Director of Health and Safety.
5. Although I have a car, as a member of student government, I represent thousands of students who do not have cars, including many members of PVAMU’s large freshman class. For many of these students, traveling to vote off-campus like to the Community Center is a challenge because of their lack of transportation.
6. Many students also do not know about or frequently use the Community Center, which is near the post office, because they get their mail on campus.
7. Even for myself and other students who have cars, the PVAMU student center on-campus is a much more convenient and central voting location than off-campus voting sites.
8. Although I am a student leader, I only learned of Waller County’s decision to provide fewer early voting opportunities to Prairie View than to other cities elsewhere in the County shortly before the October 17, 2018 Commissioners’ meeting where I provided public comment.
9. During the Commissioners’ meeting, I urged them to provide Prairie View and PVAMU students like me with an opportunity to vote during the first week of early voting and on our campus. As I told the Commissioners, I believe this is not a Democratic or Republican issue. Instead, this is a neutral issue of providing equality and parity between Prairie View and other cities.
10. Under the current plan, PVAMU students are not provided an equal number of early voting opportunities during the first week of early voting as compared to other cities in Waller County. The current plan provides Prairie View, where PVAMU is located and where Black voters are the majority, with zero voting opportunities during the first week and only five days of early voting during the second week. Two of the early voting days provided during the second week are off-campus and burdensome for students without cars and busy schedules, for example, to access.

11. Yet, my understanding is that Brookshire and Waller, which have much smaller voting populations than Prairie View, have more total early-voting days than Prairie View, including early voting days during the first week of early voting. For example, Waller gets eleven total early voting days, including six during the first week, as compared to Prairie View's five total early voting days, all during the second week.
12. I believe that early voting opportunities should be provided to PVAMU students and Prairie View residents on an equal basis with other residents of Waller County.
13. I do not believe that Waller County's current allocation of early voting opportunities is practical for students or fair to them.

I declare under penalty of perjury that the forgoing is true and correct.


Joshua Muhammad

10-22-18
Date